



September 12, 2017

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: CG Docket No. 03-123 - Telecommunications Relay Services

Dear Ms. Dortch:

On September 11, the undersigned and Roger Fleming of Northfork Strategies met with Nirali Patel, Acting Legal Advisor to Commissioner Carr, on behalf of IDT Telecom, Inc. ("IDT"). We discussed the information and analysis contained in IDT's Petition for Rulemaking filed in the above-referenced docket on November 25, 2015.¹

IDT's petition requests that the Commission issue a Notice of Proposed Rulemaking ("NPRM") in which the Commission would seek comment on the impacts and benefits of expanding the contribution base for the Telecommunications Relay Service ("TRS") by including intrastate telecommunications revenue as well as interstate and international revenue. We noted that such an expansion would not only result in a lower TRS Fund contribution factor but it would also create more stability for the fund by introducing more predictability and less volatility in the factor as it is periodically re-set. We observed that IDT's proposal has received support from relay service users and advocates for the deaf community before the FCC and in Congress and that Section 225(b)(2) of the Communications Act provides the Commission with authority to take favorable action on IDT's proposal. We noted that broader and more complex issues regarding new relay technologies, their impact on future demand and funding, efficient delivery of relay services, and jurisdictional constraints on the FCC are currently before the Commission in this docket.

Please feel free to contact me with any questions or concerns regarding this filing.

Sincerely,

A handwritten signature in cursive script that reads 'Colleen Boothby'.

Colleen Boothby
Counsel, IDT Telecom, Inc.

¹ IDT Telecom, Inc., Petition for Rulemaking, CG Docket No. 03-123 (filed Nov. 25, 2015) ("IDT Petition").